

February 6, 2006

FEB 07 2006

Brenda Rogers  
CON Commission Liaison  
Michigan Department of Community Health  
210 Townsend St. 7<sup>th</sup> Floor  
Capital View Building  
Lansing, Michigan 48913

Dear Brenda:

Allow me to introduce myself. I am George Angelidis and I am the President of a Michigan based company called Alliance-HNI, L.L.C. We are in the mobile healthcare business, specifically, Mobile CT, Mobile MRI and Mobile PET/CT. I am writing to urge the CON Commission to adopt a change to the CON Standards for MRI.

Recently we attempted to replace one of our Mobile 1.0 Tesla MRI units because it had outlived its useful clinical life. We believed we met the criteria outlined in Section 5 of the MRI CON Review Standards that require an average of 5,500 MRI adjusted procedures (we had 7,175 adjusted procedures) per Mobile MRI unit and the replacement unit offered a significant technological improvement which would enhance quality of care, increase efficiency and reduce operating costs. However, during the process, we were informed we had to use the May 1, 2005 MRI Utilization List and it indicated we had two MRI Magnets assigned to it.

The fact of the matter is until May 23, 2005 only one magnet was serving on the network. We had applied in October 2004 to expand the MRI Network and received approval in January 2005. After discussing the situation with the Department Staff, we were told in order to protect the applicant and assist the Department Staff in processing the applications, when applications involve commitment of Available Adjusted Procedures, the application is deemed complete upon submission and, at least on paper, a magnet is added to the MRI Network.

Alliance-HNI  
Operations Office  
525 S. Gould  
Owosso, Michigan 48867  
989-729-2804  
FAX: 989-725-5763

Alliance Imaging, Inc.  
North Central Region  
35 East Wacker Drive, Suite 1880  
Chicago, Illinois 60601



Alliance Imaging, Inc.  
1900 S. State College Blvd., Suite 600  
Anaheim, California 92806

Hospital Network, Inc.  
6212 American Avenue  
Portage, Michigan 49002  
269-329-3200  
FAX: 269-329-8200

Brenda Rogers  
February 6, 2006  
Page 2

Therein lays the problem for Alliance-HNI and any other Central Service Coordinator who may try to replace equipment. Even though only one magnet is operational on the network and it is generating over 5,500 adjusted procedures, the Department looks to the Utilization List and see 2 magnets and then holds us to the 11,000 (5,500 per magnet) adjusted procedures requirement.

We would recommend to the Commission that under these circumstances, Central Service Coordinators should be allowed to replace MRI Magnets that meet the basic criteria of existing CON Standards and, in fact, have only operated with the number of magnets prior to the submission of an application to expand the network.

Respectfully,

A handwritten signature in black ink, reading "George Angelidis". The signature is written in a cursive, flowing style.

George D. Angelidis, President  
Alliance-HNI, L.L.C.

C: Larry Horvath, MDCH